

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

May 7, 2007

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Ms. Melanie Moore 4550 Pershing Hall Room 102 Fort Meade, MD 20756

Re: Draft Environmental Impact Statement for Implementation of 2005 Base Realignment and Closure (BRAC) and Enhanced Use Lease Actions (EUL) at Fort George G. Meade, Maryland (CEQ#20070105)

Dear Ms. Moore:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement for Implementation of the 2005 Base Realignment and Closure (BRAC) and Enhanced Use Lease Actions (EUL) at Fort George G. Meade, Maryland. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

The BRAC Commission recommended the realignment of three main federal agencies/activities to Fort Meade: the Defense Information Systems Agency (DISA), the Defense Media Activity (DMA), and the Adjudication Activities co-location offices. All BRAC realignment activities are to relocate to Fort Meade by 2011.

In addition to the BRAC realignment actions, Forte Meade proposes to use the Army's EUL program to implement actions that would involve leasing two parcels of non-excess Army land (Sites Y and Z) to a private developer for 50 years. These parcels would be used for development of office and administrative buildings for an estimated 10,000 personnel. The developer would in turn develop and construct two 18-hole golf courses on Site S to replace existing golf course facilities which will be the site for BRAC construction.

The DEIS evaluates three alternatives: No Action, Alternative 2- BRAC Realignment plus EUL actions, Alternative 3- BRAC Realignment. The BRAC Realignment alternatives also include sub alternatives which consider site locations for the activities. EUL Sub-alternatives 2A, 2B, and 2C are also evaluated. Alternative 2, BRAC Sub-Alternative 2A is the preferred alternative. No preferred EUL Sub-alternative is specified.

The combined population change associated with implementing the preferred federal action is approximately a 15, 695 personnel gain, of which 5, 695 are related to BRAC.

Natural Resources

The sections describing the natural resources should be expanded. The FEIS should identify the location of the proposed projects and the natural resources (upland habitat, wetlands, surface water, wildlife, etc) that they might impact. The discussion should include species found, or expected, acreage, stream length, wetland functions and values, and other pertinent details. A map depicting the proposed projects in relation to the natural resources should also be provided. A table should be included that contains the size of the impacted area and the total size if it is part of a larger complex. This table should be completed for the alternatives and subalternatives analyzed in the DEIS.

Impacts to all natural resources should be avoided, minimized and mitigated. This should be discussed in the FEIS. If any water bodies are to be crossed, bridges or oversized culverts should be considered to allow for wildlife passage and habitat continuity. In addition, we support the 100 foot buffer around wetlands and water features as described in EUL 2A.

The Army should follow Executive Order 13112 regarding Invasive Species.

Cummulative Impacts

The cumulative impacts section should be expanded to address other projects in the area. Additional discussion should be provided for water and wetland resources.

Energy Efficiency and other Measures

This project presents an excellent opportunity to implement the President's Executive Order 13423: Strengthening Federal Environment, Energy and Transportation Management by incorporating energy efficiency into the renovation and construction efforts for this project. Enclosed with this letter is information that EPA recommends the Army consider when planning the renovation/construction phase of this project.

We also recommend using low impact development techniques to reduce Storm Water impacts resulting from new construction. We also recommend that the Army analyze storm water issues and controls base-wide and continue with the detailed storm drain study recommended by the Master Plan as stated on page 4-150.

Other Coordination

We recommend that the project team contact the appropriate state and federal agencies annually to coordinate on threatened and endangered species and other species of concern.

The FEIS should include more information on Site S. The Army should coordinate with other parties involved in the closure or monitoring of the landfill prior to any activities at this site.



The FEIS should include more information about the actual construction plans for the sites. There is little information about the impacts from these construction activities.

The Army should coordinate with the appropriate agencies about transportation issues in the vicinity.

Thank you for providing EPA the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Barbara Okorn; she can be reached at 215-814-3330.

Sincerely,

William Arguto

NEPA Team Leader

Office of Environmental Programs

Enclosures (2)